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April 18, 2003

NHTSA-01-8677-548

Jeffrey Runge, M.D. Administrator National Highway Traffic Safety Administration 400 Seventh Street, S.W. Washington, D.C. 20590

> Docket No. NHTSA 2001-8677, Notice 4, Regarding Amendments to the Final Rule About Reporting of Information and Documents About Potential **Defects and Retention of Records That Could Indicate Defects**

Dear Dr. Runge:

This is a Petition for Reconsideration of the Amendments in the above-referenced action. I believe a technical amendment is desirable to clarify the definition of "field report." I am attaching a copy of a marked-up version of the amended definition as well as a copy of my final proposed definition of field report.

Sincerely,

Stephen E. Selander

Storen Selano

SES/pw Enclosure

cc: Document Management Room PL 401

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A communication in writing, including communications in electronic form, from an employee or representative of a manufacturer of motor vehicles or motor vehicle equipment, a dealer or authorized service facility of such manufacturer, or an entity that owns or operates a fleet, to the manufacturer, regarding the failure, malfunction, lack of durability, or other performance problem of a motor vehicle or motor vehicle equipment, or any part thereof, produced for sale by that manufacturer and transported beyond the direct control of the manufacturer, regardless of whether verified or assessed to be lacking in merit, but does not include documents covered by the attorney client privilege or the work product exclusion.

Deleted: with respect to a vehicle or equipment that has been transported beyond the direct control of the manufacturer

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Deleted: contained in a litigation file that was created after the date of the filing of a civil complaint that relates to the specific vehicle, component, or system at issue in the litigation.

A communication in writing, including communications in electronic form, from an employee or representative of a manufacturer of motor vehicles or motor vehicle equipment, a dealer or authorized service facility of such manufacturer, or an entity that owns or operates a fleet, to the manufacturer, regarding the failure, malfunction, lack of durability, or other performance problem of a motor vehicle or motor vehicle equipment, or any part thereof, produced for sale by that manufacturer and transported beyond the direct control of the manufacturer, regardless of whether verified or assessed to be lacking in merit, but does not include documents covered by the attorney client privilege or the work product exclusion.